

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
DR. MUHAMMAD MIRZA and ALLIED :  
MEDICAL AND DIAGNOSTIC SERVICES, :  
LLC, :

Plaintiffs, :

-against- :

JOHN DOE #1 a/k/a John D., a Yelp.com user, :  
JOHN DOE #2 a/k/a Elizabeth M., a Yelp.com :  
user, JOHN DOE #3 a/k/a Robert R. a :  
Yelp.com user, JOHN DOE #4 a/k/a Zoe C., a :  
Yelp.com user, JOHN DOE #5 a/k/a Caroline :  
P., a Yelp.com user, JOHN DOE #6 a/k/a :  
Yelena P., a Yelp.com user, JOHN DOE #7 :  
a/k/a Lana W., a Yelp.com user, JOHN DOE #8 :  
a/k/a Zin N., a Yelp.com user, JOHN DOE #9 :  
a/k/a Carly D., a Yelp.com user, :

Defendants.

----- X

Case No.: 1:20-cv-09877-PGG-KNF

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law in Support of Plaintiffs' Motion for Expedited Discovery, the accompanying declaration of Muhammad Mirza, dated February 16, 2021, and upon all pleadings and proceeding heretofore had, Plaintiffs DR. MUHAMMAD MIRZA ("Plaintiff Dr. Mirza" or "Dr. Mirza") and ALLIED MEDICAL AND DIAGNOSTIC SERVICES, LLC ("Plaintiff Allied Medical" or "Allied Medical" collectively, "Plaintiffs"), by and through their undersigned counsel, will move this Court at the United States District Courthouse for the Southern District of New York, 40 Foley Square, Courtroom 228, New York, New York 10007, before the Honorable Kevin N. Fox, for leave pursuant to Federal Rule of Civil Procedure 26 to conduct expedited discovery prior to the conference required by

Federal Rule of Civil Procedure 26 on the grounds that such discovery is necessary to identify Defendants John Does #1-9 (“Defendants”).

Dated: Brooklyn, NY  
February 16, 2021

Respectfully submitted,

LEWIS & LIN, LLC

By: /s/ David D. Lin  
David D. Lin (DL-3666)  
Lauren Valli (LV-7672)  
81 Prospect Street, Suite 8001  
Brooklyn, NY 11201  
David@ilawco.com  
Lauren@ilawco.com  
Tel. (718) 243-9323  
Fax: (718) 243-9326

*Attorneys for Plaintiffs*